

Exhibit A

Proposed Order

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES AND EXCHANGE COMMISSION,

Plaintiff,

v.

RIPPLE LABS INC., BRADLEY GARLINGHOUSE, and
CHRISTIAN A. LARSEN,

Defendants.

Case No.:
20-cv-10832 (AT)(SN)

**[PROPOSED] ORDER FOR ALL NON-PARTY MOTIONS TO SEAL PARTIES'
MOTIONS FOR SUMMARY JUDGMENT AND RELATED MATERIALS**

Plaintiff Securities and Exchange Commission (“SEC”) and Defendants Ripple Labs Inc., Bradley Garlinghouse, and Christian A. Larsen (collectively, the “Parties”) jointly request that the Court establish a deadline of January 4, 2023 by which any non-parties must move to seal portions of the Summary Judgment Materials or else waive any objections to the Court’s ultimate ruling on the Parties’ sealing applications; and January 18, 2023 by which any Parties or non-parties may file oppositions to non-party sealing motions.

IT IS HEREBY ORDERED THAT: any non-parties must file, by **January 4, 2023**, a motion to seal any Summary Judgment Materials to the extent the non-party seeks additional or different sealing treatment or redactions than requested by the Parties; and, by **January 18, 2023**, all Parties and non-parties must file oppositions, if any, to the non-party motions to seal. If no such motion is received by **January 4, 2023**, the non-party will have waived their right to object to the Court’s ultimate ruling on the Parties’ motions to seal or redact the Summary Judgment Materials.

Dated: _____, 2022

By: _____
Honorable Analisa Torres
United States District Judge